

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RICHARD ROBINS,  
*Plaintiff,*

v.

STATE BAR OF TEXAS,  
COMMISSION FOR LAWYER  
DISCIPLINE,  
JOHN BRANNON, and  
THE HONORABLE RAQUEL WEST  
*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§

Civil Action No. 4:23-cv-00404

---

**BUSINESS-RECORD AFFIDAVIT FOR DEFENDANTS, THE  
COMMISSION FOR LAWYER DISCIPLINE AND JOHN BRANNON'S  
MOTION TO DISMISS PURSUANT TO FRCP 12(B)(1) AND 12(B)(6)**

---

STATE OF TEXAS §  
§  
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, personally appeared Anne Davis,  
who, being by me duly sworn, deposed and said:

1. My name is Anne Davis. I am over 18 years of age, of sound mind,  
capable of making this affidavit, and am personally acquainted with the facts herein  
stated:

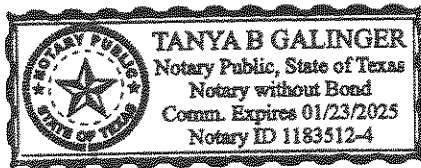
2. I am employed as an Administrative Coordinator with the Chief  
Disciplinary Counsels Office of the State Bar of Texas, and as such I am the  
custodian of the below-described records attached to this affidavit.

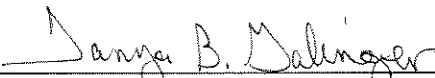
3. The records attached to this affidavit as Exhibits 2, 4, 5, 6, and 7, are

kept by the Chief Disciplinary Counsels Office in the regular course of business. It was in the regular course of business for an employee or representative of the Chief Disciplinary Counsels Office with knowledge of the act, event, condition, or opinion or diagnosis that was recorded, to make this record or to transmit the information to be included in this record. The record was made at or near the time of the act, event, condition, or opinion recorded, or reasonably soon thereafter. The records attached hereto are exact duplicates of the originals in our files.

  
\_\_\_\_\_  
Anne Davis

SWORN TO AND SUBSCRIBED BEFORE ME this 13th day of March 2023.



  
\_\_\_\_\_  
Notary Public, State of Texas

---

**EXHIBITS TO DEFENDANTS, THE COMMISSION FOR LAWYER  
DISCIPLINE and JOHN BRANNON’S MOTION TO DISMISS PURSUANT  
TO FRCP 12(b)(1) AND 12(b)(6)**

---

- Exhibit 1: Plaintiff’s Claims for Legal and Equitable Relief, filed on November 17, 2016, in Cause No. 66097; styled, *Cindy Crisp v. John Robert Sauls*, in the County Court of Smith County Texas.
- Exhibit 2: Affidavit of Austen Clinkenbeard dated November 5, 2018.
- Exhibit 3: Order on Defendant’s motion to strike the pleadings in Cause No. 66097; styled, *Cindy Crisp v. John Robert Sauls*, in the County Court of Smith County Texas, dated October 23, 2017.
- Exhibit 4: Original Disciplinary Petition and Requests for Disclosure filed on July 12, 2018, in Cause No. 2018-46488; styled, *Commission for Lawyer Discipline v. Richard Andert Robins*, in the 61<sup>st</sup> Judicial District Court of Harris County, Texas.
- Exhibit 5: Judgment of Disbarment entered in Cause No. 2018-46488; styled, *Commission for Lawyer Discipline v. Richard Andert Robins*, in the 61<sup>st</sup> Judicial District Court of Harris County, Texas, on February 13, 2013.